



## Opinion from Energie-Cités

### Proposal for a Directive Energy performance of buildings October 2001

#### Proposition of Directive of the European Parliament and the Council presented by the Commission

[COM(2001) 226 final 2001/0098 (COD)]

## 1 - Presentation

Energie-Cités read with great interest the proposal for a Directive on the energy performance of buildings published by the Commission.

Considering that residential and tertiary buildings account for more than 40% of final energy consumption in the Community, the Commission took the initiative on 11.5.2001 in proposing a Directive aimed at promoting the improvement of the energy performance of new and existing buildings [COM(2001) 226 final 2001/0098 (COD)].

The proposal covers five main elements:

- > establishment of a general framework of a common methodology for calculating the integrated energy performance of buildings,
- > application of minimum standards on the energy performance to new buildings and to certain existing buildings when they are renovated,
- > certification schemes for new and existing buildings on the basis of the above standards,
- > public display of energy performance certificates and recommended indoor temperature and other relevant climatic factors in public buildings and buildings frequented by the public,
- > specific inspection and assessment of boilers and heating/cooling installations.

The proposal is available from:

[http://europa.eu.int/eur-lex/fr/com/dat/2001/fr\\_501PC0226.html](http://europa.eu.int/eur-lex/fr/com/dat/2001/fr_501PC0226.html)

## 2 - Overall evaluation

Energie-Cités:

- > gives a warm welcome to this initiative for it gives practical expression to the priorities set up in the Green Paper on the Security of Energy Supply as regards energy efficiency and renewable energy,
- > approves the fact that the proposed Directive is a concrete answer that is globally in keeping with the challenges facing the building sector,
- > agrees with the Commission's rationale, with its intentions and objectives and with the scope of the proposed Directive,
- > considers that any reservation from Member States about the appropriateness of launching such initiative at Community level would send negative signals to the citizens and must absolutely be avoided.

## **3 - Comments and suggestions**

### **3.1 - Common methodology for integrated energy performance standards**

Energie-Cités agrees with the Commission's approach in that:

- > it aims at establishing a common methodology for integrated energy performance standards,
- > gives more flexibility to designers to apply the above standards and be creative,
- > facilitates the comparison of buildings,
- > forms the basis for integrated minimum energy performance standards for different building categories reflecting local circumstances.

However, non-installed equipment present in buildings, and in particular in tertiary buildings (office equipment, audio-visual aids, refrigerators etc.) constitutes as many internal heat sources when in service. The question would therefore be whether to integrate this heat gain in energy demand calculations instead of considering them separately.

### **3.2 - Application of standards to new buildings and to certain existing buildings when they are being renovated**

Energie-Cités agrees with the Commission on the necessity to consider existing buildings as well as new ones. It is necessary to raise their performance to a level that is as close as possible to that of new buildings. In case of major renovations, cogeneration and renewable energy should also be examined.

### **3.3 - Certification schemes for new and existing buildings on the basis of the above methodology**

Energie-Cités agrees with the Commission's approach as regard:

- > transparency and information on energy performance and asks that the energy performance certificate be mandatory for selling or renting a property,
- > the proposed certification formulation, but suggests that it includes information on annual consumption costs as well as recommendations for the improvement of the energy performance, in addition to information on energy performance level (in kWh for example),
- > the necessity for those in charge of public buildings to set an example by displaying their own energy performance.

However, we consider that to be fully effective, this last measure should be complemented by additional measures aimed at facilitating control by the citizens:

- > a comprehensive CO<sub>2</sub> emissions and energy performance indicator (by analogy with the classification for household appliances) to give the general public a simple idea of the performance level of the building (including the part of the demand covered by renewables and cogeneration)
- > an obligation to publish on the Internet the energy performance of public buildings belonging to public authorities – Community institutions, Member States, local and regional authorities – or privately owned or occupied buildings frequented by the public.

Energie-Cités suggests that :

- > encouraging municipalities to start displaying the energy performance of their buildings frequented by the general public, without waiting for the Directive to be passed,
- > the experience of our network be used by the Commission to set up comprehensive and meaningful indicators for the citizens.

Energie-Cités also insists on the fact that:

- > the introduction of energy performance certificates is likely to have socio-economic repercussions, especially in terms of job creation (energy advisers etc.).
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### 3.4 - Specific inspection and assessment of heating/cooling installations

Energie-Cités agrees with the Commission's approach.

### 3.5 - Savings potential

As regard **energy savings**, Energie-Cités considers that:

- > the integrated approach, including the integration of primary energy, is a good approach,
- > if a legal instrument is indispensable, experience has shown that it is often difficult to enforce implementation and a legal approach is not sufficient,
- > energy regulations should be complemented by the appointment of energy (or flow) managers in buildings greater than 1 000(?) m<sup>2</sup> ; this would facilitate the implementation of a previous suggestion on the publication of energy results (it is not possible to carry out a demand-side management policy without involving new decentralised players),
- > Public grants for the construction or major renovation of buildings must be subjected to an obligation to meet specific energy performance requirements.

Concerning environmentally-friendly energy generation installations, Energie-Cités considers that:

- > the importance of district heating and cooling networks should be emphasised for they offer by far the most suitable option for using biomass, including in the cogeneration mode (the demand for biomass wood is higher in countries with extensive heat networks),
- > commercial incentives in favour of non-renewable energy sources must be proscribed to avoid accentuating the distortion of competition between energy sources to the detriment of renewable energy,
- > the role of local authorities in local energy planning and the control of local energy companies must be clearly reaffirmed, failing which the objectives in terms of local renewable energy sources may not be met.

Concerning building **design and orientation**, Energie-Cités considers that:

- > given their responsibilities in land use planning, building permits, urban planning etc., local authorities have a crucial role to play, the implementation of new energy performance requirements necessitating their direct involvement as well as exchanges of good practice between municipalities,
- > when considering construction or major renovation works, owners of public buildings must include energy performance requirements in their specifications so as to take account of operating costs and not only construction costs,

Monitoring, assessment, transition and **good practice**

Considering that setting up the whole process may take some time, Energie-Cités recommends:

- > to propose the replication of proven good practice on a voluntary basis (see indicative list below).

## 4 - Measures inspired by decisions already made by some member States

1. Encourage municipalities to start a benchmarking process at European / national / regional level so that they can measure and compare their energy performance (E5 system, 3 Länder in Austria, street lighting, Finland)
2. Obligation to publish the energy performance of municipal buildings
3. Include in any call for tenders for the construction of a new building a commitment towards energy results / procurement (Montpellier, France; Vienna, Austria; Heidelberg, Germany)
4. Obligation to launch an action programme aiming at reducing energy consumption in households in the municipality (United-Kingdom / Home Energy Conservation Act)
5. Appoint a municipal councillor in charge of energy efficiency / sustainable local energy policy
6. Set up a local energy person/team in municipalities, with interdepartmental competency
7. Obligation to work out an integrated planning of the energy resources (Denmark) or an Energy Municipal Plan (Sweden, Poland)
8. Obligation to build a local *Agenda 21* (United-Kingdom)
9. Propose a programme of municipal measures aiming at reducing greenhouse gas emissions
10. Obligation to use cogeneration in all the generation plants supplying heat networks (Denmark)
11. Obligation to investigate the potentials for cogeneration in the municipality
12. Obligation to investigate the potentials for renewable energy in the municipality
13. Set up contracts including guarantee-of-result schemes as regard energy performance and greenhouse gas emissions reduction between the State and the local authorities (in preparation, The Netherlands)
14. Creation of an Energy Forum open to citizens and local associations
15. Creation of a Local Energy Agency or an Energy Advice Centre,
16. Obligation for all local gas and electricity providers to pay in a certain amount (to be defined) per customer to finance – under municipal control – energy efficiency advice actions or local energy agencies (Denmark)
17. Obligation for each national energy agency / ministry to produce a programme to support municipal action in the field of energy efficiency in buildings and climate change.

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